

CONTINUATION OF COMPLAINT

1. I, Theodore Westra, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), currently assigned to the ATF Field Office in Grand Rapids, Michigan since January of 2015. Prior to that, I was a Drug Enforcement Administration (DEA) Task Force Officer for 6 years and had been a State of Michigan Certified Law Enforcement officer since 1998. My responsibilities include the investigation of criminal violations of Title 18 of the United States Code.

2. The information in this criminal complaint is on my personal knowledge gained from my participation in this investigation, including witness interviews by myself and/or other law enforcement agents. The provided information outlined below is for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

3. I am investigating Lamar Immanuel-Dontrice BELL for violations of federal firearms laws.

4. On January 21, 2021, Kalamazoo Department of Public Safety (KDPS) was investigating a shooting which occurred earlier that day. BELL had been identified as being present at the scene of that shooting and extensive surveillance by KDPS personnel had been conducted on BELL until he was contacted in the parking lot of 3150 S Westnedge, seated in the front passenger seat of a vehicle. While contacting BELL, KDPS officers could see in plain view a Kel-Tec 9mm firearm within BELL's reach within the vehicle. KDPS detained BELL and secured the firearm, which contained a 31-round magazine.

5. BELL waived his Miranda rights and agreed to speak with KDPS Officers. BELL told officers he had been "shot-at" earlier in the day and he instructed his girlfriend Desiree Downey to get the firearm from their apartment and bring it to the vehicle for their safety. BELL admitted he handled the firearm that day and that he had shot the firearm in the past. Desiree Downey was the driver of the vehicle and registered owner of the firearm.

6. Downey was also interviewed by officer and she admitted that she brought her firearm from 1016 Mills Street and handed it to BELL. Downey stated BELL took the firearm and positioned it in the vehicle to "shoot back" in case they got shot at.

7. The firearm that was seized from the vehicle is a KEL-TEC CNC Industries, Inc., Model SUB 2000, 9mm rifle, serial number FFQT11, was manufactured and/or distributed from the State of Florida.

8. KDPS obtained and served a State of Michigan search warrant at 1016 Mills Street, Kalamazoo, MI. (Downey and BELL'S residence) Officers located and seized:

- 9mm ammunition. Located in the family room closet.
- Glock magazine piece. Located in the kitchen.
- Holster. Located in the family room closet.
- BB gun magazine. Located in family room closet.
- M&P 40 magazine with one bullet. Located in east bedroom closet.
- Kel Tec Gun box. Located in east bedroom closet.
- Kel Tec purchase paperwork. Located in east bedroom closet.

8. A review of BELL's criminal history through Law Enforcement Information Network (LEIN) reveals a Felony Conviction for Carrying a Concealed Weapon, from 9th Circuit Court in Kalamazoo on 09/26/2016. BELL was initially sentenced as a Youthful Trainee. However, BELL violated the terms of his probation and in September 13, 2017 his status was revoked and he now stands convicted of the felony offense.

9. As part of his probation, on September 26, 2016, BELL signed an acknowledgement that stated, in part, "I also understand that federal and/or state law may prohibit me from possessing or purchasing ammunition or a firearm (including a rifle, pistol, or revolver)"

10. The foregoing is provided in support of this complaint charging that Lamar Immanuel-Dontrice BELL, knowing that he had been convicted of a felony, did knowingly possess a firearm in violation of 18 U.S.C. § 922(g)(1).